

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1337 (***)

AUDIOVOX COMMUNICATIONS CORP.,
AUDIOVOX ELECTRONICS CORP., NIKON
CORPORATION, NIKON INC., NOKIA
CORPORATION, NOKIA INC., SANYO
ELECTRIC CO., LTD., and SANYO NORTH
AMERICA,

Defendants.

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1338 (***)

APPLE COMPUTER, INC.; ARGUS a/k/a
HARTFORD COMPUTER GROUP, INC.;
CASIO COMPUTER CO., LTD.; CASIO, INC.;
CONCORD CAMERAS; DELL
INC.; EASTMAN KODAK COMPANY; FUJI
PHOTO FILM CO., LTD.; FUJI PHOTO FILM
U.S.A., INC.; FUJITSU LIMITED; FUJITSU
AMERICA, INC.; FUJITSU COMPUTER
PRODUCTS OF AMERICA, INC.; KYOCERA
WIRELESS CORP.; MATSUSHITA
ELECTRICAL INDUSTRIAL CO.;
MATSUSHITA ELECTRICAL
CORPORATION OF AMERICA; NAVMAN
NZ LIMITED; NAVMAN U.S.A. INC.;
OLYMPUS CORPORATION; OLYMPUS
AMERICA, INC.; PENTAX CORPORATION;
PENTAX U.S.A., INC.; SONY
CORPORATION, SONY CORPORATION OF
AMERICA; SONY ERICSSON MOBILE

COMMUNICATIONS AB; SONY ERICSSON
MOBILE COMMUNICATIONS (USA) INC.;
TOSHIBA CORPORATION; and TOSHIBA
AMERICA, INC.

Defendants.

HONEYWELL INTERNATIONAL INC., AND
HONEYWELL INTELLECTUAL
PROPERTIES INC.,

Plaintiff,

vs.

CITIZEN WATCH CO., LTD. AND CITIZEN
DISPLAYS CO., LTD.,

Defendants.

Case No. 1:05 CV 00874 ***

**DECLARATION OF TAKUJI NAKAO IN SUPPORT OF DEFENDANTS
CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.'S
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, TAKUJI NAKAO, hereby state as follows:

1. I make this Declaration based on personal knowledge, I am over the age of 18, and I am competent to testify to the matters set forth herein.
2. I became an employee of Citizen Displays Co., Ltd. on April 1, 2005. Before that, I was an Engineering Department employee of the Liquid Crystal Device Division for Citizen Watch Co., Ltd.
3. At all times prior to December 2005, Citizen was informed by Matsushita that the RANDO module was not intended for shipment to the United States. The RANDO module is also known as the K1122H-HL LCD module.

4. Attached hereto as Exhibit A is a true and correct copy of an email memorandum I sent to members of the Engineering Department on March 10, 2005. This memorandum confirmed that "information from Matsushita indicated that RANDO is not intended for shipment to the United States."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Tokyo, Japan, this 6th day of December, 2007.

中尾卓司
Takuji Nakao